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District of Nevada

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	2:14-CV-564-GMN-(PAL)
)	
\$3,734.00 IN UNITED STATES)	
CURRENCY,)	
)	
Defendant.)	

**UNITED STATES' SECOND UNOPPOSED MOTION TO EXTEND
CAFRA DEADLINE TO FILE CIVIL FORFEITURE COMPLAINT**

The United States of America by and through Daniel G. Bogden, United States Attorney for the District of Nevada and Michael A. Humphreys, Assistant United States Attorney, respectfully moves this Court to grant a thirty day continuance, or until June 30, 2014, for the United States to file its complaint for forfeiture in the above-captioned matter. Currently, the CAFRA deadline for the United States to file its complaint is May 30, 2014.

...

1 The reason for the requested extension of time is that the United States continues to evaluate
2 the merits of the case to decide whether it should proceed by way of civil forfeiture proceedings or
3 criminal forfeiture proceedings against the seized assets.

4 On Friday, May 30, 2014, Government counsel spoke by telephone with Osvaldo Fumo,
5 Claimant's counsel, and Attorney Fumo gave his consent for Government counsel to communicate
6 to this Court that he has no objection to the Government's request for a continuance in this matter.

7 This motion is not submitted solely for the purpose to delay or for any other improper
8 purpose.

9 WHEREFORE, the United States moves this Court to grant a thirty-day continuance, or until
10 June 30, 2014, for the United States to file its civil forfeiture complaint and/or incorporate the
11 forfeiture in a criminal charging document.

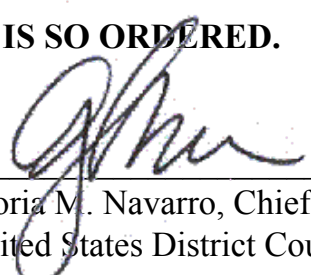
12 DATED this 30th day of May 2014.

13
14 Respectfully submitted,

15 DANIEL G. BOGDEN
16 United States Attorney

17 /s/Michael A. Humphreys
18 MICHAEL A. HUMPHREYS

19 **IT IS SO ORDERED.**

20 
21 _____
22 Gloria M. Navarro, Chief Judge
23 United States District Court

24 **DATED: 06/04/2014**
25
26

CERTIFICATE OF SERVICE

It is hereby certified that service of the foregoing **UNITED STATES' SECOND UNOPPOSED MOTION TO CONTINUE THE CAFRA DEADLINE** was made by sending a copy of same by first class mail, addressed to Claimant's counsel, Osvaldo Fumo, on this 30th day of May, 2014:

Osvaldo Fumo
601 Las Vegas Blvd. S.
Las Vegas, NV 89109

/s/ Ray Southwick
Ray Southwick
Forfeiture Support Associates Paralegal